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*Attorneys for Plaintiffs ALISU INVESTMENTS, LTD.,  
and KARGO GROUP GP, LLC*

**UNITED STATES DISTRICT COURT**

**CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

ALISU INVESTMENTS, LTD. and  
KARGO GROUP GP, LLC,

Plaintiffs,

v.

TRIMAS CORPORATION d/b/a/ NI  
INDUSTRIES, INC.; BRADFORD  
WHITE CORPORATION; LUPPE  
RIDGWAY LUPPEN; PAULA BUSCH  
LUPPEN; METAL PRODUCTS  
ENGINEERING; DEUTSCH/SDL,  
LTD.; RHEEM MANUFACTURING  
COMPANY; and INFINITY  
HOLDINGS, LLC,

Defendants.

AND ALL COUNTERCLAIMS

Case No. 2:16-CV-00686 MWF (PJWx)

Honorable Michael W. Fitzgerald

**JOINT STATUS REPORT AND  
REQUEST FOR EXTENSION AND  
[PROPOSED] ORDER**

1 Plaintiffs Alisu Investments, Ltd. and Kargo Group GP, LLC (collectively  
2 “Plaintiffs”), Defendants Bradford White Corp. (“Bradford”) and Infinity Holdings,  
3 LLC (“Infinity”) (collectively, “Defendants”), submit this Joint Status Report  
4 pursuant to the Court’s June 29, 2022 Order (Dkt No. 330).

5 Since the last update submitted to the Court, the remaining parties – Plaintiffs,  
6 Bradford, and Infinity (collectively, the “Parties”) – have continued to engage in  
7 good faith settlement discussions and remain of the view that acceptable settlements  
8 may be reached but the parties require more time to reach such settlements as  
9 explained herein.

10 Plaintiffs and Infinity believe they are close to a resolution and presently do  
11 not need anticipate requiring any court assistance.

12 On September 8, 2022, Plaintiffs submitted a Remedial Action Plan (“RAP”)  
13 as requested by Department of Toxic Substances Control (“DTSC”). Plaintiffs had  
14 previously (July 25, 2022) submitted a Feasibility Study (“FS”) to DTSC. Plaintiffs  
15 and Bradford have been communicating with DTSC regarding the FS and RAP to  
16 facilitate DTSC approval. However, DTSC has informed Plaintiffs that it requires  
17 more time for review.

18 While an approved FS and RAP have not yet issued, Plaintiffs presently  
19 estimate that DTSC should complete its review of the FS and RAP by the first quarter  
20 of 2023. Following DTSC review of the FS and RAP, the RAP (and any related  
21 documents) will be made available for a 60-day public comment period, which, after  
22 review and comments, will be followed by DTSC approval of the RAP. Plaintiffs  
23 best estimate is that this regulatory process should be largely complete by the second  
24 quarter of 2023.

25 Plaintiffs and Bradford agree that DTSC’s approval of the FS and RAP will  
26 have a direct correlation to the recovery sought and potential settlement ranges, as  
27 the scope of remediation work is the central issue regarding the dollars amount of a  
28 settlement between the Plaintiffs and Bradford. The issuance of approved the FS

1 and RAP will further allow the parties to better understand the universe of damages  
 2 and make informed decisions concerning settlement. Plaintiff and Bradford wish to  
 3 explore settlement but require DTSC's approval of the FS and RAP before they may  
 4 do so, and believe that a further extension of the present stay will facilitate such  
 5 settlement efforts.

6 As such, the parties request an extension of the stay until May 2023 so they  
 7 can obtain approval of the FS and RAP from the DTSC defining the required scope  
 8 of remediation.

9  
 10 Dated: October 14, 2022

**SHER EDLING LLP**

11 By: /s/ Matthew K. Edling

12 Matthew K. Edling  
 13 Timothy R. Sloane

14 *Attorneys for Plaintiffs ALISU*  
 15 *INVESTMENTS, LTD, and KARGO GROUP*  
*GP, LLC*

16 Dated: October 14, 2022

**ALLEN MATKINS LECK GAMBLE  
 17 MALLORY & NATSIS LLP**

18 By: /s/ Tim C. Hsu

19 John J. Allen  
 20 Tim C. Hsu

21 *Attorneys for Defendant Bradford White*  
 22 *Corporation*

23 Dated: October 14, 2022

**A|D|Y Law Group, P.C.**

24 By: /s/ A. David Youssefye

25 A. David Youssefye

26 *Attorney for Defendant Infinity Holdings,*  
 27 *LLC*

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**ECF CERTIFICATION**

I, Matthew K. Edling, in compliance with Civil Local Rule 5-4.3.4(a)(2)(i), hereby attest that the above-named counsel has concurred in this filing.